



MEMO ENDORSED

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July 17, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Defendants' request for an extension of the parties' time to file a stipulation of dismissal until July 31, 2023 is granted. A status conference is scheduled for August 2, 2023 at 9:30 a.m. The parties are directed to dial 877-411-9748 and enter access code 3029857# when prompted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: July 19, 2023

New York, New York

Re: Franco v. LTS Century Building, LLC et al., 19-cv-09846 (ER)

Dear Judge Ramos:

We represent Defendants LTS Century Building, LLC, Barnes & Noble, Inc., and Barnes & Noble Booksellers, Inc. (collectively, "Defendants") in the above-referenced matter. In accordance with Rule 1.E of Your Honor's Individual Practices, with Plaintiff's consent, and for the reasons summarized below, we respectfully write to request an extension of the parties' time to file a stipulation of dismissal until July 31, 2023.

Although, as Defendants previously noted, the parties have finalized their Settlement Agreement (the "Agreement"), and Defendants have transmitted the settlement payment pursuant to the terms of the Agreement, Defendants, as between themselves, continue to work and progress toward finalizing other details pertaining to certain non-monetary relief provided for under the Agreement. As Defendants must finalize those outstanding items prior to the filing of the stipulation of dismissal, and Plaintiff's filing of a stipulation of remediation, we respectfully request the relief sought herein, which Defendants expect will afford them sufficient time to do so.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

By: s/ Evan B. Citron

Evan B. Citron

cc: All counsel of record (via ECF)